

Privacy Policy

1. Definitions and Interpretation

“**Personal data**” means any and all data that relates to an identifiable person who can be directly or indirectly identified from that data. In this case, it means personal data that you give to us either via our website or by other means of communication. This definition shall, where applicable, incorporate the definitions provided in the EU Regulation 2016/679 – the General Data Protection Regulation (“GDPR”); and

“**We/Us/Our**” means The Small Countries Financial Management Centre.

2. Information about us

2.1 The Small Countries Financial Management Centre is a charity registered in the Isle of Man, under charity number 1044 and a company limited by guarantee registered in the Isle of Man under company number 123601C, whose registered address is The Nunnery, Old Castletown Road, Douglas, IM2 1QB.

2.2 Our Data Controller is Mark Shimmin, who can be contacted by email at mark.shimmin@scfmc.im, by telephone on +44 7624 450 603, or by post at The Nunnery, Old Castletown Road, Douglas, IM2 1QB.

3. What does this policy cover?

We respect an individual’s fundamental right to privacy. We endeavour to be open and transparent with individuals when processing their personal data.

This Privacy Policy applies to all personal data we collect by whatever means we collect it.

4. Your Rights

4.1 As a data subject, you have the following rights under the GDPR, which this Policy and our use of personal data have been designed to uphold:

- **4.1.1** The right to be informed about our collection and use of personal data;
- **4.1.2** The right of access to the personal data we hold about you (see section 8);
- **4.1.3** The right to rectification if any personal data we hold about you is inaccurate or incomplete (please contact us using the details in section 9);
- **4.1.4** The right to be forgotten – i.e. the right to ask us to delete any personal data we hold about you (we only hold your personal data for a limited time, as explained in section 7 but if you would like us to delete it sooner, please contact us using the details in section 9);
- **4.1.5** The right to restrict (i.e. prevent) the processing of your personal data;
- **4.1.6** The right to data portability (obtaining a copy of your personal data to re-use with another organisation) and
- **4.1.7** The right to object to us using your personal data for particular purposes.

4.2 If you have any cause for complaint about our use of your personal data, please contact us using the details provided in section 9 and we will do our best to solve the problem for you. If we are unable to help, you

also have the right to lodge a complaint with the IoM's supervisory authority, the Information Commissioner's Office.

4.3 For further information about your rights, please contact the Information Commissioner's Office, whose contact details are:

Information Commissioner, First Floor, Prospect House, Prospect Hill, Douglas, Isle of Man. IM1 1ET

Tel: +44 1624 693260

Website: www.inforights.im

5. Collection of Personal Data

5.1 We collect personal data for the following purposes:-

- the organisation, presentation and evaluation of training Programmes
- for the purpose of correspondence, for example the issuing of newsletters or other relevant information, either through our website, or by email or other means of communication
- staff administration
- accounts and records
- undertaking actions consistent with our aims and objectives as set out in Section 4 of the Memorandum and Articles of Association of the Small Countries Financial Management Centre, as follows:

4. The Company is established with the objective of reducing poverty and improving financial governance through the promotion of education relating to the government financial sector in small countries or countries whose economy or infrastructure has been adversely affected by wars or conflict by:-

- (a) the organisation and provision of targeted executive education and technical training courses and materials conducted by practitioners and academics to provide improved skills, deeper understanding and general best practice around financial regulation, risk management, and broader management of government financial activities.
- (b) the provision of an international forum for sharing knowledge, encouraging debate and discussion and driving innovation by the advancement of education and training by hosting conferences, seminars, working groups and networking events for global regulators and industry practitioners from small countries;
- (c) the establishment of an international research and training centre for developing, facilitating, promoting and carrying out research and training into global regulatory issues concerning the international financial services markets in small countries order to obtain better understanding of such issues and to publicise, disseminate and publish the useful results of such research and provide a forum for their discussion;
- (d) the development of ideas and best practice which are unbiased by any particular regulatory regime and are developed based on rational, scientific bases, drawing on and reflecting the practical experience in small countries and elsewhere, and understanding of global regulators and industry practitioners and thereby the achievement of an international reputation.

6. How do we obtain your personal information?

We collect information when you give it to us directly. This may be by:

- 6.1** Submission of an Online Application Form in relation to our training programmes or any other events we may organise;
- 6.2** Submission of applications for training programmes or any other events we may organise, by email or any other form of communication chosen by you;
- 6.3** Submission of information necessary for the administration and operation of the training programmes or any other events we may organise;
- 6.4** Any other means by which you provide information to us. For example, if you send us an email, we may collect your name, your email address, and any other information which you choose to give us.

7. How do we use your data?

7.1 Any personal data we collect will be processed and stored securely, for no longer than is necessary in light of the reason(s) for which it was first collected. We will comply with our obligations and safeguard your rights under GDPR at all times. For more details on security see section 8, below.

7.2 If you contact us and we obtain your personal details from your email, or any other form of communication, or by means of the online application form on our website, we may use them as follows:

7.2.1 Processing including access, viewing, use, modification, copying, transfer, recording, storage and deletion of Personal Data, as necessary for the provision of the services provided by us as set out in Section 5 above, including for the purposes of the preparation, organisation, operation and evaluation of training programmes or other events provided by us, personnel and project management and administration, maintaining information resources and databases to enable us to provide you with details of future programmes or events provided by us or any other additional information that we consider relevant to the training programmes or events we may provide and accounts and record keeping including, but not limited to billing purposes.

7.2.2 To reply to your email;

7.3 You have the right to withdraw your consent to us to use your personal data at any time, and to request that we delete it. We will comply with all such requests.

7.4 We will not share any of your data with any third parties for any purposes.

7.5 We do not place cookies on your computer or device, nor do we use any other means of data collection.

8. How and where do we store your data?

8.1 We only keep your personal data for as long as we need to in order to use it as described above in section 7, and/or for as long as we have your permission to keep it.

8.2 Your data will only be stored in the Isle of Man or the EU.

8.3 Data security is very important to us, and to protect your data we have taken suitable measures to safeguard and secure any data we hold about you (even if it is only your email address).

9. How can you access your data?

You have the right to ask for a copy of any of your personal data held by us (where such data is held). Under the GDPR, no fee is payable and we will provide any and all information in response to your request free of charge. Please contact us using the contact details below in section 10.

10. Contacting Us

If you have any questions about this Privacy Policy or our use of your personal data, please contact us by email at mark.shimmin@scfmc.im , by telephone on +44 7624 4520 603, or by post at The Nunnery, Old Castletown Road, Douglas, IM2 1QB. Please ensure that your query is clear, particularly if it is a request under section 8, above for information about the data we hold about you.

11. Changes to our Privacy Policy

We may change this Privacy Policy from time to time (for example, if the law changes). Any changes will be immediately posted on our website (www.scfmc.im) and you will be deemed to have accepted the terms of the Privacy Policy on your first use of the website following the alterations. We recommend that you check this page regularly to keep up-to-date

Version 2: This policy was created on 5th November 2020.